

Kenneth R. Puhala (KP-8104)  
SCHNADER HARRISON SEGAL & LEWIS LLP  
140 Broadway, Suite 3100  
New York, New York 10005-1101  
(212) 973-8000  
(212) 972-8798 (fax)  
*Attorneys for Defendant*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
JOEL S. ARIO, in his official capacity as :  
Acting Insurance Commissioner of the :  
Commonwealth of Pennsylvania, as statutory :  
Liquidator of RELIANCE INSURANCE :  
COMPANY (IN LIQUIDATION) :  
1311 Strawberry Square :  
Harrisburg, Pennsylvania 17120 :  
:

Plaintiff,

v.

CONSTITUTION STATE SERVICES, LLC :  
f/k/a CONSTITUTION STATE SERVICE :  
COMPANY :  
c/o Travelers Indemnity Co. :  
One Tower Square 5 MN :  
Hartford, Connecticut 06183 :  
:

Defendant.  
-----X

Civil Action No.: 07-CV-7454 (LTS)

FILED  
U.S. DISTRICT COURT  
2007 OCT 18 PM 2:16  
S.D.N.Y.

**MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Kenneth R. Puhala, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of:


Wilbur L. Kipnes  
Schnader Harrison Segal & Lewis LLP  
1600 Market Street, Suite 3600  
Philadelphia, PA 19103-7286  
Telephone: 215-751-2000  
Facsimile: 215-751-2205

Wilbur L. Kipnes is a member in good standing of the Bar of the State of Pennsylvania.

There are no pending disciplinary proceedings against Wilbur L. Kipnes in any State or Federal Court.

Dated: New York, New York  
October 18, 2007

SCHNADER HARRISON SEGAL &  
LEWIS LLP

By: 

Kenneth R. Puhala (KP-8104)

140 Broadway, Suite 3100  
New York, New York 10005  
(212) 973-8000  
(212) 972-8798 (fax)  
*Attorneys for Defendant*

UNITED STATES DISTRICT COURT  
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One Tower Square 5 MN :  
Hartford, Connecticut 06183 :

Defendant. :  
-----X

Civil Action No.: 07-CV-7454 (LTS)

**DECLARATION OF KENNETH R. PUHALA IN SUPPORT  
OF APPLICATION FOR ADMISSION *PRO HAC VICE*  
OF WILBUR L. KIPNES**

Kenneth R. Puhala, an attorney admitted to practice before this Court, declares the following:

1. I am a partner at SCHNADER HARRISON SEGAL & LEWIS LLP, counsel for Defendant, Constitution State Services, LLC f/k/a Constitution State Service Company.
2. I submit this Declaration in support of the application for admission *pro hac vice* to the bar of the United States District Court for the Southern District of New York of Wilbur L. Kipnes. If admitted, Mr. Kipnes will serve as co-counsel for Defendant.

3. Mr. Kipnes is a partner at SCHNADER HARRISON SEGAL & LEWIS LLP. Mr. Kipnes maintains an office at 1600 Market Street, Suite 3600, Philadelphia, Pennsylvania 19103-7286.

4. Mr. Kipnes was admitted to practice before the courts in the following jurisdictions on the dates set forth below:

Supreme Court of Pennsylvania, October 1974.

A Certificate of Good Standing is attached hereto.

5. I have found Mr. Kipnes to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.


6. Accordingly, I am pleased to move for the admission of Wilbur L. Kipnes, *pro hac vice*.

7. I respectfully submit a proposed order granting the admission of Wilbur L. Kipnes, *pro hac vice*, which is attached hereto as Exhibit A.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Dated: New York, New York  
October 18, 2007

SCHNADER HARRISON SEGAL &  
LEWIS LLP

By:   
Kenneth R. Puhala (KP-8104)  
140 Broadway, Suite 3100  
New York, New York 10005  
(212) 973-8000  
(212) 972-8798 (fax)  
*Attorneys for Defendant*



**Supreme Court of Pennsylvania**

**CERTIFICATE OF GOOD STANDING**

***Wilbur L. Kipnes, Esq.***

**DATE OF ADMISSION**

***October 17, 1974***

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



**Witness my hand and official seal**

**Dated: October 5, 2007,**

  
Patricia A. Johnson  
Chief Clerk

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
:  
JOEL S. ARIO, in his official capacity as :  
Acting Insurance Commissioner of the :  
Commonwealth of Pennsylvania, as statutory :  
Liquidator of RELIANCE INSURANCE :  
COMPANY (IN LIQUIDATION) :  
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Hartford, Connecticut 06183 :  
:

Defendant. :  
-----X

Civil Action No.: 07-CV-7454 (LTS)

**ORDER FOR ADMISSION  
PRO HAC VICE  
ON WRITTEN MOTION**

Upon the motion of Kenneth R. Puhala, counsel for Defendant, Constitution State Services, LLC f/k/a Constitution State Service Company and said sponsor attorney's declaration in support;

IT IS HEREBY ORDERED that

Wilbur L. Kipnes  
Schnader Harrison Segal & Lewis LLP  
1600 Market Street, Suite 3600  
Philadelphia, PA 19103-7286  
Telephone: 215-751-2000  
Facsimile: 215-751-2205  
[wkipnes@schnader.com](mailto:wkipnes@schnader.com)

is admitted to practice *pro hac vice* as counsel for Defendant, Constitution State Services, LLC f/k/a Constitution State Service Company in the above captioned case in the United States District Court for the Southern District of New York . All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of

attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: New York, New York  
October \_\_, 2007

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United States District Judge

**AFFIDAVIT OF SERVICE**

STATE OF NEW YORK       )  
  ) ss.:  
COUNTY OF NEW YORK    )

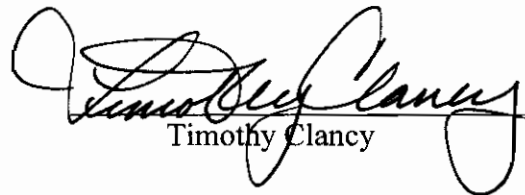
Timothy Clancy, being duly sworn, deposes and says, deponent is not a party to this action, is over eighteen (18) years of age and resides in Monmouth County, New Jersey.

On October 18, 2007, I served a true copy of the attached MOTION TO ADMIT COUNSEL PRO HAC VICE, with accompanying documents, upon:

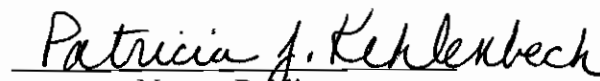
John A. Wait, Esq.  
FOX ROTHSCHILD LLP  
100 Park Avenue  
Suite 1500  
New York, New York 10017

Gerard E. Arth, Esq.  
Cheryl A. Garber, Esq.  
FOX ROTHSCHILD LLP  
2000 Market Street, Tenth Floor  
Philadelphia, Pennsylvania 19103

by First Class Mail.

  
Timothy Clancy

Sworn to before me this  
18th day of October, 2007

  
Notary Public

**PATRICIA J. KEHLENBECK**  
Notary Public, State of New York  
No. 01KE6037739  
Qualified in Nassau County  
Commission Expires February 28, 20 10